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Attorneys for Plaintiff (pending withdrawal)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ZOYA KOVALENKO,

Plaintiff,

V.

KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S.
DEORAS, P.C., AND MARK FAHEY,

Defendants.

) Case No.: 22-cv-05990-HSG

DECLARATION OF TANVIR H. RAHMAN IN SUPPORT OF FILIPPATOS PLLC's ADMINISTRATIVE MOTION TO CONVERT THE MARCH 20, 2025, HEARING TO A TELEPHONIC OR VIDEO CONFERENCE

1 I, TANVIR H. RAHMAN, declare:

2 1. I am an attorney at law in good standing and licensed to practice law in the States of
3 New York and New Jersey, admitted to practice in this Court *pro hac vice*, and a Partner at Filippatos
4 PLLC. I have represented Plaintiff Zoya Kovalenko in this case, with the assistance of local counsel
5 Hennig Kramer LLP (now Kramer Brown Hui LLP). If called as a witness, I would and could
6 competently testify to the following facts, all of which are within my own personal knowledge.
7

8 2. Filippatos PLLC is a law firm based in New York.

9 3. It would be a hardship for me to have to travel to Oakland, California simply to attend
10 the hearing scheduled for March 20, 2025, in person given the length of time and expense it would
11 take to travel cross country to and from California, as well as the disruption it would cause to certain
12 family and childcare obligations I have.
13

14 4. I am a practicing Muslim, and it will be a hardship for me to travel to and from
15 Oakland, California in the present month of Ramadan while I will be fasting during daytime hours.

16 5. All hearings that have taken place since Filippatos PLLC has appeared in this case
17 have been conducted remotely without issue, including the hearing with respect to Plaintiff's Motion
18 to Quash Defendants' Subpoenas and For Protective Order (Dkt. No. 113), which was held remotely
19 on February 15, 2024 (*see* Dkt. Nos. 125; 146); a discovery hearing which took place remotely on
20 October 2, 2024 (*see* Dkt. No. 143); and a Case management Conference held remotely on October
21 8, 2024. *See* Dkt. No. 153.
22

23 6. I have conferred with counsel for Defendants who have no objection to this request.

24 7. I have conferred with Plaintiff Zoya Kovalenko who has indicated that she does not
25 consent to this instant request because she does not believe there is good cause to request a remote
26 hearing.
27
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